

Document 49, Lynn Sims, Portland, OR  
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HLW EIS Web Comments		HLW & FD	EIS PROJECT - AR7PF Control # DC-49
From:	HLWFDEIS Web Site		
Sent:	Tuesday, March 21, 2000 4:00 AM		
To:	web@jason.com		
Cc:	web_archive@jason.com		
Subject:	HLW EIS Web Comment		
<p>Name: Lynn Sims            Affiliation:            Address1: 3959 NE 42            Address2:            City, State Zip: Portland, OR 97213            Telephone: 5032876329            Date Entered: (s '2000-03-21 04:00:22'            Comment:            Idaho High-level Waste and Facilities Disposition DEIS</p>			
<p>Thank you for the opportunity to comment.  <del>I</del> Attended the public meeting in Portland, OR and compliment the participants upon both the quality of presentation and informative materials and displays. Unfortunately that meeting was not well-attended—not due to lack of interest, but <del>IX.C.6</del> because of very poor publicity and communications.</p>			
<p><del>49.1</del> Decisions regarding the "disposal" of high-level and related wastes should be made from this time forward when decisions are being made to generate these terrible wastes in the first place. We must use more common sense, with a responsible vision for the future. A lack of these elements will result in more serious complications, such as those that lead to this dilemma, and others all over the DOE complex.</p>			
<p><del>49.2</del> <del>49.3</del> <del>49.4</del> <del>49.5</del> <del>49.6</del> <del>49.7</del> <del>49.8</del> <del>49.9</del> <del>49.10</del> Waste treatment alternatives should lean towards leaving liquid and calcinated waste as is, as long as their containment structures are deemed safe and reliable. Liquid wastes should be diminished in volume and converted if overwhelming technical problems are not forthcoming. At any point, the results of careful monitoring could prompt alternative waste treatments in order to protect the environment and groundwater. <del>49-5</del> <del>II.D.1 (5)</del></p>			
<p><del>49.11</del> Since there is no vitrification facility at Hanford at this time and since there is no licensed HLW Repository, it seems premature to make a record of decision which definitely include these options. It must also be remembered that many Hanford structures are already corroded and leaking and in serious emergency status. Until these problems are satisfactorily addressed, Hanford cannot accept more burden.</p>			
<p><del>49.12</del> Facility closures should be determined upon the risks to the environment and their ability to contain wastes and radiation. All facilities should be maintained as needed and depending upon the risk of failure be closed on a case by case basis.</p>			
<p><del>49.13</del> After commenting for nearly a decade now upon many equally complicated and frightening environmental impact statements, I would surely hope that someone would, from this point forward, make it a crime to create any more chemical and radioactive waste which is not directly involved in a clean up effort. It also should not have to be mentioned, but unfortunately it must be said that more monies should be allocated to monitoring, maintenance, containment, clean up and research technology rather than going for wasteful projects such as stockpile stewardship, weapons research and star wars defense. We've already targeted our own homeland by mismanagement and wrong priorities. It is time to face up to our predicament and do what we can to avoid impending and future disaster.</p>			
<p>Thank you to everyone who is working so hard on these tremendous issues</p>			
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HLW & FD		EIS PROJECT - AR7PT Control # DC-50
<p><b>Original</b></p> <p>United States Department of Energy</p> <p>IN RE: U.S. Department of Energy )   )   )   )</p>		
<p>BEFORE Peter Richardson Hearing Examiner</p> <p>February 17, 2000, 6 p.m.</p> <p>Doubletree Riverside 2900 Chinden Boulevard Boise, Idaho</p>		
<p>Reported by Marta M. Rice CSR No. T-205</p>		
<p>THE REALTIME COURT REPORTERS <b>TUCKER</b> AND ASSOCIATES, LLC 208-345-3704 • 1-800-424-2354 Fax 208-345-3713 605 WEST FORT STREET P.O. BOX 1625 • BOISE, ID 83701 Home Page: <a href="http://www.tuckercourtreporters.com">http://www.tuckercourtreporters.com</a> E-Mail: <a href="mailto:tucker@tuckercourtreporters.com">tucker@tuckercourtreporters.com</a></p>		

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Before Peter Richardson  
Hearing February 17, 2000

In Re: U.S. Department of Energy  
United States Department of Energy

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[1] Individuals who wish to make oral comments tonight in this room will be given three minutes each, and those representing organizations will be given five minutes. If you are representing an organization, please let the staff know at the registration table when you sign up.

[2] And I will appreciate your efforts to conclude your remarks within the allotted time frame. We have a staff person sitting here in the front row who has a yellow card. And he will raise that card when you have one minute left in your comments to get your attention to do so, and then you have one minute left.

[3] Now, as the presiding officer for this evening's hearing, I will reserve the right to ask speakers to conclude their remarks in order to stay on schedule. I hope you will understand that if I do have to ask you to conclude your remarks, it will be because it is my job to make sure that all people who are interested in making oral comments have an equal and fair opportunity to do so.

[4] If I do stop you before you have concluded your remarks, I hope you will submit the rest of your comments in writing through the internet or by telefax.

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[1] A few points on decorum. Please avoid side-bar conversations in this room that might interfere with the proceedings or distract attention from the designated person who is providing comments. Smoking is not allowed in the hearing room. And in order to avoid disruptions at this meeting, if you have handout materials that you would like to make available, there is space on the registration tables for you to do so.

[2] Finally, I would like to explain a little bit about the role of the court reporter at this meeting. Her job is to transcribe verbatim the formal comment portion of this evening's hearing. In order to help her create as accurate a record as possible, when I call your name, please come up to the podium and speak directly into the microphone, and prefacing your remarks with your name and the spelling of your name. And if you would like to receive a copy of the final Environmental Impact Statement, please provide your mailing address.

[3] If you are also representing an organization, prefacing your remarks with the name of the organization you're representing and the capacity in which you are its representative. If

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[1] the court reporter is having trouble hearing you or keeping up with you, she may interrupt to ask you to either slow down or speak up.

[2] Now I will begin the formal comment portion of the hearing, and I want to stress that this is a formal hearing and a recorded proceeding with a full transcript being prepared. And finally, I would like to take the opportunity to thank you for your cooperation in observing the procedures I've outlined. Our first scheduled commentator is Steve Hopkins, and Mr. Hopkins will be followed by Todd Martin, Mr. Hopkins.

[3] MR. HOPKINS: My name is Steve Hopkins, H-o-p-k-i-n-s. And I'm representing the Snake River Alliance of Idaho. The Snake River Alliance has served as a citizen watchdog of activities at the Idaho National Engineering and Environmental Laboratory for 20 years.

[4] It should be noted first that we do support treatment of this waste and do believe that, contrary to the plant on the incinerator, that this waste does need to be treated and stabilized and isolated from the environment.

[5] I would mainly like to talk about the various alternatives that are delineated in the

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[1] Environmental Impact Statement, because I feel, in reading this document, that there is a great deal more science fiction and politics than sound science in the document.

[2] For instance, in looking at the various separations alternatives, these alternatives are unsound. They've never been demonstrated to work on an industrial scale. And I believe they would not even be attempted at this point if it weren't for the fact that largely this issue is about the moving of waste to a new place, and trying to engineer around Yucca Mountain in Nevada as an attempt to get down to the waste isolation plant in New Mexico.

[3] I have to point out here that if treatment fails, then environmental protection has failed. And we have too much to risk here if treatment should fail, because this is dangerous material. It does pose a risk to the aquifer. We have contamination passed in the aquifer as a result of past nuclear weapons activities, and we do need to stabilize this waste.

[4] I'm looking at the areas of uncertainty and controversy that were pointed out earlier in the presentation. And I have to say that it's just 50-6  
VII D(6)  
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[1] phenomenal that these issues are not looked at in the Environmental Impact Statement. For one, it is possible for DOE to select a hybrid of alternatives.

[2] Something that's not actually separate in the EIS for the public to evaluate is that in the final EIS, we could have a preferred alternative that really was even in the Draft Environmental Impact Statement. And that doesn't allow the public to adequately review the selected alternative.

[3] How can we, if we can't even see it. And that's the problem is that we couldn't live with an alternative that's not even specified in the Environmental Impact Statement.

[4] The fact that the costs are analyzed separately. There is a separate document that is not part of the NEPA process. That presents a tremendous problem, because costs are the main factors when it comes to deciding what is done.

[5] Although, I'm hearing from various DOE officials that it seems unlikely that there will be two vitrification plants that will be built in such a close proximity to one another.

[6] However, if you look closely at the cost

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VII.E(1)

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VII.D(6)

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III.D.3(i)

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X(3)

50-14  
X.P(6)

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III.D.3(i)

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[7] analysis, which unfortunately is not in the document and is viewed separately, you'll see that the bifurcation treatment is actually among the more — among the cheapest of the various treatment technologies. It's far cheaper than the separations technologies — especially full separation.

[8] It then becomes more expensive whether you add in these extremely speculative costs of disposing the wastes in Yucca Mountain. And I have to point out here that Yucca Mountain itself represents a tremendous uncertainty. It's likely that it should open. It's not going to open on time.

[9] Also, looking at a statement in the draft EIS that points out a study done by the National Academy of Sciences under the National Resource Council, or Research Council, and it is stated that the study, which is important to the DOE in terms of deciding what to choose in the

[10] way of treatment, it's pointing out that it does not conflict with the Draft Environmental Impact Statement. But in looking closely at the NIC report, this is not the case.

[11] At this point, separations technologies

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[12] MR. MARTIN: My name is Todd Martin. It is spelled just like the tennis player. Two d's, Ma-t-t-i-n. I'm here at the pleasure of the Snake River Alliance. They asked me to come down and take a look at the document in light of experiences at the Hanford Nuclear Reservation where I focus my activism. I'm not going to pretend I know everything about INEEL, because I don't.

[13] But I do know what has happened to Hanford and what has went wrong. And I hope that this site is not going to make the same mistakes as us. And I want to review some of those.

[14] In 1989 Hanford decided to pursue a separations alternative similar to many that are outlined in this document. Hanford chose Trux, the same technology outlined in this document, to separate tank waste and put the low-activity waste in a cementitious ground form, the high-activity waste in glass, very similar to multiple separations alternatives in this document.

[15] The facilities that were to do that were supposed to start operating exactly two months ago. If you go out to the Hanford Nuclear Reservation, you will see blank, empty fields where those

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- New Information -

Idaho HLW & FD EIS

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[1] facilities were supposed to be built. What [2] happened? [3] Trux didn't work and wouldn't work. It [4] was too risky, and it was too expensive. It wasn't [5] science; it was science fiction. Grout was found [6] to be not protective of human health in the [7] environment. The DOE weapons context is littered [8] with examples where grout is not a robust enough [9] waste form to take the significant amount of [10] radionuclides these sites try to force into it. [11] So after five years and \$1.2 billion, [12] Hanford finally threw in the towel, threw grout out [13] and decided we will glassify, vitrify all of our [14] wastes, including the low-activity waste, and we [15] won't do Trux. We will do a simple pre-treatment [16] process. [17] The lessons learned from this process [18] can be applied at INEEL. First of all, don't do [19] Trux. Don't do advanced separations, Hanford was [20] 60 percent of the nation's high-level waste. [21] Defense waste couldn't make it pay nor make it [22] work. INEEL has only 3 percent. [23] It's highly unlikely that even if it [24] worked that it would pay off. Plus, the document [25] Steve cited, the NRC document, says it's a long	Page 47 <i>5001-7 VII.D.3(b)</i>
	Page 46
[1] shot that it would ever work. [2] Second lesson: Don't rely on Yucca [3] Mountain. The speculated repository was speculated [4] costs. [5] In 1994 a broad group of Hanford [6] stakeholders, known as the Tank Waste Task Force, [7] sent a recommendation to DOE that said, "We feel [8] that the tank waste at Hanford is going to stay at [9] Hanford for the foreseeable future. We don't [10] really think Yucca Mountain will exist." [11] Therefore, Yucca Mountain assumptions [12] about cost shouldn't drive the decisions we make [13] here. Get it out of the tanks and in a safe and [14] stable form here at Hanford. Don't let [15] Yucca Mountain back us into a corner. It costs a [16] lot of money and takes a lot of risks. [17] Third lesson: Don't make unrealistic [18] assumptions about budget. If you look at the cost [19] document, you see that three — all of these [20] alternatives — three, four, sometimes ten times as [21] much money as currently today goes into the [22] high-level waste program would be required. It's [23] highly unlikely that that money is going to appear. [24] If I were the decision maker, I'd have [25] two questions that I'd need this document to	Page 48 <i>5001-2 VII.E.6 5001-3 X(1) 5001-5 X(1) 5001-6 X(1)</i>
	Page 49
[1] answer. First, what will work? Second, what can I [2] afford? Unfortunately, as has been pointed out, [3] technical viability and cost are both scoped [4] outside of this document. [5] As a result, we could enter an [6] alternative into a document that says, let's just [7] turn the waste into wine. It would be extremely [8] technically difficult to do so, but that's not [9] considered by the EIS. [10] It would be extremely expensive to [11] figure out how to turn all this waste into wine, [12] but neither is that considered by the EIS. The [13] characteristics that are considered by the EIS, [14] cultural values, transportation values, [15] socioeconomic impacts in the local community. [16] Turning waste into wine would fare very [17] well in all of those categories. It could easily [18] become the preferred alternative. It's an [19] extremely ridiculous example that demonstrates the [20] uselessness of considering these alternatives [21] without looking at cost or technical viability. [22] Hanford has the overwhelming burden of [23] high-level waste. Three times in the last decade [24] Hanford has gone to congress with an all-or-nothing [25] proposal. We have said Hanford's going to treat	Page 49 <i>5001-7 VII.A(4)</i>
	Page 48
[1] all its tank waste in a generation. Hanford is [2] going to minimize life-cycle cost by forcing it all [3] into Yucca Mountain. We want it all. [4] Three times in the last decade congress [5] has said, fine, you get nothing. What I'm here to [6] say for INEEL is that you should not go to congress [7] with an all-or-nothing proposal. Rather, you [8] should ask for something, because that's probably [9] what you can get. [10] And what I think that something is, is [11] to aggressively retrieve, treat, and safely store [12] the remaining liquids. Hanford has bent over [13] backwards to figure out how to calcine our liquid [14] tank waste, because calcine is a relatively safe [15] and stable waste form. [16] Now, I look at this EIS and there are [17] multiple alternatives that want to take a step [18] backwards. Take that relatively safe waste form [19] redissolve it into a dangerous liquid waste, all [20] for the purpose of running it through a process [21] that is unlikely to work and that the site probably [22] can't afford. That seems like foolishness to me. [23] Any option that includes the dissolution [24] of the calcine for the purpose of running it [25] through a separations process, such as Trux,	Page 48 <i>5001-8 X(1) 5001-9 VII.P.3(i)</i>
	Page 49
[1] theirs. In God love, we need to clean up our [2] mess. [3] This problem needs a miracle. And the [4] way to produce this miracle is to continue to work [5] together — each breath continuing our best efforts [6] for the children. We are inseparably joined in our [7] common mess. [8] And what can we do? As Ann said, list [9] in list out, perpetually move away, quit thinking [10] about a solution for the children. As this [11] gentleman said, consider a crap shoot. No, I think [12] not. [13] We all know we need to make less waste, [14] less mess. Less mess is part of a solution for the [15] children. Yet, now we must focus on love on the [16] existing mess and what is best for our children. [17] Putting the mess in the air is to [18] pollute us even more. And the babies, how will [19] they be contaminated? Will they be mutated? How [20] will their cancers be cured? What else, pollute [21] the waters, pollute our earth, pollute the [22] heavens. What else can we do? [23] This is a mess we have together. What [24] can we do together for the children? What can we [25] do together? Pray together. What can we do?	Page 50 <i>5001-10 VII.D.3(i)</i>
	Page 51
[1] should be abandoned. The focus should remain on [2] safely retrieving, solidifying, and storing the [3] remaining liquid waste. Thank you for the [4] opportunity to comment. [5] MR. RICHARDSON: Thank you for your comments. [6] I believe Mr. Stratton is not going to be [7] commenting. Steven Milhouse Barr. [8] MR. BARR: I'll pass, thank you. [9] MR. RICHARDSON: Thank you, Mr. Barr. [10] Reverend MsMere. Okay Reverend. [11] REVEREND MSMERIE: Hello, My name is [12] Reverend MsMere. That's M-s-M-e-r-e. [13] MR. RICHARDSON: Reverend, could you get a [14] little closer to the microphone? [15] REVEREND MSMERIE: Sure. I'm the Pastor of [16] Mere Peace Church in Boise, Idaho. And my ministry [17] is presenting, writing a spiritual peace poetry of [18] prose for the children — to the children. I'm [19] also a member of the Snake River Alliance. [20] And I speak in behalf of the children. [21] Mere peace for the children. What can we do? What [22] can we do about what we have done? What is our [23] solution for the children? What can we do about [24] our common mess? We're all involved through [25] grandparents, parents, ourselves, our children, and	Page 51 <i>5001-11 VII.D.3(i)</i>
	Page 52
[1] decision-making process. It's really a lot of fun [2] in a lot of ways. [3] And on the other hand, it is so entirely [4] complex. I was looking at this display back here, [5] and I could just feel myself going into a food [6] coma, or gridlock, brain dead, or something, [7] because there is just so much there. [8] So in that case, it's what the citizen [9] needs to do, whether they're an activist or someone [10] who is an observant citizen, is they need to start [11] with some guiding principles for how they are going [12] to wade through this process. [13] And that is exactly what the [14] Snake River Alliance has recently done at one of [15] its board meetings, is establish some operating [16] contextual principles. And rather than speak to [17] the specific draft EIS, although I may quickly [18] refer to it, given that now I have to talk real [19] fast. [20] I'd like to run through those guiding [21] contextual principles that we use when we are [22] looking at something like this. One of them is [23] that we have and will always continue to fight for [24] the guiding principle of an open process with full [25] public participation and public involvement.	Page 52 <i>5002-1 VII.B.2 5002-2 VII.B.2 5003-1 VII.A(6)</i>

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[1] Love. Love together. How can we help ourselves? [2] With the help of God. Love. How can we help [3] together for the children? [4] In love, let's do something together. [5] With the love of God, for the love of the children. [6] Together, love is our answer now. And as Tom says, [7] "Let's finish the job," somehow using love. Thank [8] you, Jesus. Mere peace, love. Thanks. [9] MR. RICHARDSON: Thank you for your comment. [10] Fritz Björnsen indicated to me that he was going to [11] decline to comment. At least orally this evening. [12] Pamela Allister. [13] MS. ALLISTER: I need some clarifications, [14] please. I represent the Snake River Alliance; [15] however, I'm making personal comments. Am I a [16] three-minute one, or a five-minute one? [17] MR. RICHARDSON: The rules are, if you are [18] representing an organization, you have five [19] minutes. If you are speaking on your own behalf, [20] you have three minutes. [21] MS. ALLISTER: All right. Thank you. My [22] name is Pamela Allister, A-l-l-i-s-t-e-r. I live [23] in Boise, Idaho. What I like about this draft EIS [24] is that it's not a simple yes and no EIS. It's a [25] multiple orient equation — a complex	Page 51
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[1] theirs. In God love, we need to clean up our [2] mess. [3] This problem needs a miracle. And the [4] way to produce this miracle is to continue to work [5] together — each breath continuing our best efforts [6] for the children. We are inseparably joined in our [7] common mess. [8] And what can we do? As Ann said, list [9] in list out, perpetually move away, quit thinking [10] about a solution for the children. As this [11] gentleman said, consider a crap shoot. No, I think [12] not. [13] We all know we need to make less waste, [14] less mess. Less mess is part of a solution for the [15] children. Yet, now we must focus on love on the [16] existing mess and what is best for our children. [17] Putting the mess in the air is to [18] pollute us even more. And the babies, how will [19] they be contaminated? Will they be mutated? How [20] will their cancers be cured? What else, pollute [21] the waters, pollute our earth, pollute the [22] heavens. What else can we do? [23] This is a mess we have together. What [24] can we do together for the children? What can we [25] do together? Pray together. What can we do?	Page 52
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<p>Before Peter Richardson Hearing February 17, 2000</p> <p>Page 53</p> <p>[1] And I am specifically going to make a comment of somewhat of a distress about this particular hearing. It's very difficult to put something into three minutes that is weighing 15 to 20 pounds when it came into the office.</p> <p>[2] So I would encourage the decision makers to be more flexible on the amount of time that people can have. And I was particularly thinking today about, there are some of us who are not white Anglo-Saxon Protestants and don't operate well in a very tight constraining time schedule that's extremely rigid.</p> <p>[3] And I know that, and I just wanted to commend you for going to the Fort Hall Reservation, and I hope that you are culturally sensitive when you do that, to the pressure the time constraints can make on people who are trying to deal with such a complex issue. So that is principle number one.</p> <p>[4] A second and very important principle for the Snake River Alliance and activists, such as ourselves, is do not create more risks by the process that you are establishing.</p> <p>[5] And this particular EIS illustrates that there are at least four or five different places where we are running the risk of creating more risk</p> <p>5003-7 11.D.(3)</p> <p>5003-3 11.C.(4)</p> <p>5003-4 11.D.(4)</p> <p>5003-5 11.E.(1)</p> <p>5003-6 11.D.(9)</p> <p>5003-7 11.G.(1)</p> <p>Page 54</p> <p>[1] with what we already have, that there is unproven technology and unsound scientific methods including the plans for where they may dispose of this waste in the long-term.</p> <p>[2] And many of the options are including transportation, which we feel is a risk. The grinding principle for the Alliance, then, is to store the waste as safely as possible in a monitored situation and try not to move it around too much.</p> <p>[3] Another principle is to stop creating more waste. It looks as if — that we need to create further efforts to be aware that we have this mess, because we used a process that we felt was a good idea at the time: reprocessing.</p> <p>[4] And we have now acquired a huge problem that is probably one of the most expensive cleanup jobs that we have in this state and in our neighboring state.</p> <p>[5] And I hope that we will take into account what an important lesson this has been about the use of technology that seems right at the moment, but may not be right later. I'm running out of time.</p> <p>[6] So the last four are going really</p> <p>5003-1 11.G.(1)</p> <p>Page 55</p> <p>[1] fast — just the basic principles, which are cleanup with scare, prioritize the money spent to the risk. Then we heard a lot about money tonight, whether the income is going to be there and whether or not we have a value to cost.</p> <p>[2] Reduce the highest risk first. This is taking into consideration the entire DOE complex at INEEL. This is high-risk waste that does need to be attended to as soon as possible.</p> <p>[3] And lastly, our guiding, overarching principle, do everything we can to protect the land, the air, the water, from nuclear contamination, especially and particularly in our case, the Snake River Plains Aquifer, and thus, the human environment and all of these pieces. Thank you.</p> <p>[4] MR. RICHARDSON: Thank you for your comment. I remind you that the Department of Energy and the State of Idaho are providing a variety of methods for you to submit your comments.</p> <p>[5] You may submit them in writing. You may drop them off in the comment box. You may submit them over the Internet. You may submit them by fax. There is no limit on the amount of written comments you may submit.</p> <p>5003-8 VII.B.(5)</p> <p>5003-9 VII.B.(5)</p> <p>5003-10 11.A.(5)</p> <p>Page 56</p> <p>[1] And written comments receive the same weight in the record as do oral comments made at this and the other public meetings. If you would like to make an oral comment this evening and haven't had an opportunity to do so, I'd ask that you register at the registration table or, otherwise, just indicate to me that you would like to come up and make a comment.</p> <p>[2] Ms. Allister was our last pre-registered commentator this evening, and I'll note that no one so indicated. So what we will do at this point is take a break, subject to call of the chair, and we'll be off the record.</p> <p>[3] (Brief recess.)</p> <p>[4] MR. RICHARDSON: We'll take the Idaho hearing on the United States Department of Energy's, Idaho High-level Waste and Facilities Disposition Draft Environmental Impact Statement.</p> <p>[5] It's now 8:40 p.m. We're back on the record after a short break, having taken comments earlier. I'd ask if there is anyone in the audience this evening who would like to comment on the Draft Environmental Impact Statement, but who has not yet had an opportunity to do so.</p> <p>[6] We will let the record reflect that none</p> <p>5003-1 11.G.(1)</p> <p>Min-U-Script® Tucker &amp; Associates (208) 345-3704</p> <p>Page 53 - Page 56 (16)</p>
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**Oregon**  
John A. Kitzhaber, M.D., Governor



March 23, 2000

Mr. Thomas L. Wichman  
Document Manager,  
U.S. Department of Energy, Idaho Operations Office  
850 Energy Drive, MS 1108  
Idaho Falls, Idaho 83401-1563

Dear Mr. Wichman,

Thank you for the opportunity to comment on the Idaho High Level Waste and Facilities Disposition draft Environmental Impact Statement (EIS). These comments are submitted on behalf of the State of Oregon. They should be considered as an addition to written comments provided by Ken Niles of my staff at the Portland public meeting on February 22, 2000.

Our previous comments focused primarily on conditions under which Oregon could potentially consider future treatment of Idaho's high-level waste at Hanford. The comments provided here focus more on the technical elements of the draft EIS.

We have two overarching concerns with this draft EIS:

51-1 11.A.(3) • We believe the "mix and match" philosophy of this EIS is inappropriate. Putting together pieces of different alternatives to create a hybrid alternative creates an alternative that has not been analyzed in an integrated fashion in the EIS.

51-2 11.E.(2) • This EIS is too hypothetical to be used as a decision making document. For example, construction on the facilities being considered for Hanford's own use in the Hanford Option will not begin for several years even if they are approved and funded. Final waste dispositions discussed in the EIS rely on facilities still in the research, planning and approval phase. The future existence of these facilities is not certain and is many years away at best. And, these facilities may not be compatible with Idaho waste.

51-3 11.E.(2) • We recommend that Hanford references in this EIS be removed and re-evaluated and the ROD deferred due to the large uncertainties associated with the alternatives being considered.

51-4 11.E.(2)

There is another point I would like to make. I am greatly concerned about the manner in which the Portland public meeting was conducted. Although the information provided was fair and understandable, I must object to the rigid format used in conducting the meeting. My staff suggested a less formal format to reflect the small turnout. We were

51-5 11.C.(3)

(1)

Office of Energy  
625 Marion St. NE, Suite 1  
Salem, OR 97301-3742  
Phone: (503) 378-4040  
Toll Free: 1-800-221-8035  
FAX: (503) 373-7806  
www.energy.state.or.us

- New Information -

Idaho HLW & FD EIS